

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

CIRCUIT CITY STORES, INC., et al.

Debtors.

Chapter 11

Case No. 08-35653

Jointly Administered

MOTION FOR ADMISSION PRO HAC VICE

Louis E. Dolan, Jr., (the “Movant”) an attorney and a member in good standing of the bars of the State of Virginia, the United States District Court for the Eastern District of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia hereby moves the Court to enter an order permitting Gina M. Fornario (the “Admittee”) to practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia for the purpose of representing the California Self Insurers Security Fund, pursuant to Rule 2090-1(E)(2) of the Local Rules of the Bankruptcy Court of the Eastern District of Virginia (the “Local Rules”) in the above-captioned Chapter 11 case and any related adversary proceedings. In support of this motion, the Movant respectfully represents as follows:

1. Gina M. Fornario is an attorney at the law firm of Nixon Peabody LLP (“Nixon Peabody”). Nixon Peabody maintains an office at One Embarcadero Center, 18th Floor San Francisco, CA 94111-3600 and its telephone number there is (415) 984-8200.

2. Ms. Fornario is a member of the state bars of New York and California and she is admitted to practice before the United States District Court of the Northern District of California. The Admittee is a member in good standing and eligible to practice in every jurisdiction in which she has been admitted to practice. There are no disciplinary proceedings pending against the

Admittee in any jurisdiction and she has never been suspended or disbarred in any jurisdiction.

The Admittee understands that if she is admitted *pro hac vice*, she will be subject to the disciplinary jurisdiction of this Court.

3. The Movant requests that the Court allow the Motion so that the Admittee may file pleadings and appear and be heard at hearings in this Chapter 11 case in accordance with the requirements of Local Rule 2090-1(E)(2).

4. An affidavit in support of this motion to admit Ms. Fornario *pro hac vice* is attached herewith and incorporated herein by reference as Exhibit ("A").

5. The Movant respectfully requests that this Court treat this Motion as a written memorandum of points and authorities or waive any requirement that this Motion be accompanied by a written memorandum of points and authorities as described in Local Rule 9013-1(G).

6. Notice of this Motion has been provided to the Office of the United States Trustee for the Eastern District of Virginia, Richmond Division, counsel to the above-captioned debtors, and counsel to the creditor's committee. Due to the administrative nature of the relief requested herein, Movant submits that no other or further notice need be given.

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WHEREFORE, Louis E. Dolan, Jr. respectfully requests that the Court enter an order permitting Ms. Fornario to appear *pro hac vice* in and in connection with this Chapter 11 case and grant such other relief as is deemed appropriate.

Dated: August 19, 2009

Respectfully Submitted,

NIXON PEABODY LLP

/s/ Louis E. Dolan
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-and-

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*Counsel for California Self Insurers
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**AFFIDAVIT OF GINA M. FORNARIO IN SUPPORT
OF MOTION FOR ADMISSION PRO HAC VICE**

Gina M. Fornario, being duly sworn, deposes and says:

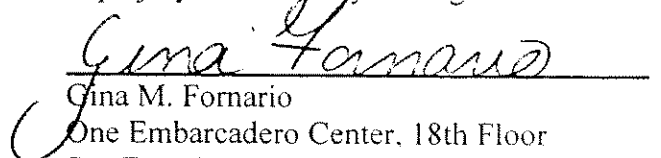
1. I am an attorney at the law firm of Nixon Peabody LLP, ("Nixon Peabody"), which maintains an office at One Embarcadero Center, 18th Floor San Francisco, CA 94111-3600. Nixon Peabody's telephone number is (415) 984-8200.

2. I admitted to practice before the United States District Court for the Northern District of California and the state bars of New York and California.

3. I am a member in good standing and eligible to practice in every jurisdiction to which I have been admitted. There are no disciplinary proceedings pending against me and I have never been suspended or disbarred in any jurisdiction.

4. Within the last ninety days, I have read the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and reread the Federal Rules of Civil Procedure, the Federal Rules of Evidence, and the Federal Rules of Bankruptcy Procedure.

Signed under the pains and penalties of perjury this 19th day of August 2009.


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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2009, a true and complete of the foregoing was filed and served electronically using the Court's ECF system and was sent by first class mail, postage prepaid, to the entities at the addresses indicated below:

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I also hereby certify that a caused a copy of the foregoing document to be delivered in PDF format, by e-mail to: circuitcityservice@mcquirewoods.com and project.circuitcity@skadden.com

/s/ Louis E. Dolan

LOCAL RULE 9022-1 CERTIFICATION

I hereby certify that the foregoing has been either endorsed or served upon all necessary parties.

/s/ Louis E. Dolan